

June 13, 1991

To: Mike Relf, Jim Langseth of Barr Engineering

From: Cindy J. Nolan, EPA

Response to items discussed at meeting of 5/30 and conference call of 6/6/91.

1. Suggested language changes concerning potential exposure pathway discussion.

Page 4-9. Change first sentence from "Several potential pathways are not feasible..." to "Several potential pathways may not be likely..."

2. Availability of maps and data.

All available data that I have regarding the New Slip construction was forwarded to Barr. I have written OMC to elaborate on my request for a comprehensive data summary to include such additional information as field observations during construction, water level measurements, etc. I do not expect that information for 2 -3 weeks. Glen Lenzi will provide an "as-built" sketch within a few days. He is checking on water level measurements, particularly with respect to the old monitoring wells. He thinks that information may have been collected and he thinks they can provide it without difficulty.

3. Some additional input on "background".

Per our discussion about the number of samples at the water treatment plant, either 4 or 5 borings would suffice.

In giving some thought to Pat Doyle's point concerning responsibility for contaminants which are both site related and anthropogenic, I think sample locations north of Sea Horse Drive and north of the OMC plant 2 building do more to answer that concern than the locations selected near the railroad tracks west of the site. Those locations are too far from the site to draw conclusions relating to the site and the proximity to the tracks would only provide information if one were investigating railroad tracks.

4. IEPA VOC method.

The State prefers the sample tubes (split spoon inserts) with immediate capping to eliminate the head space for the sampling of VOCs. The tube material does not have to be stainless steel. True, the sample cannot be visually inspected, but the samples around it can be. In addition, with the fairly consistent soil matrix at this site, there is minimal risk of losing important information from not having seen the sample.

5. Disposal of purge water.

The issue is CERCLA compliance with RCRA for investigation derived waste. If the waste is put back with in the Area of Contamination (AOC) from which it came, placement has not occurred and treatment standards are not triggered. If the waste from different AOCs is mixed before being put back, then placement has occurred and treatment standards apply. So, don't mix the waste. This is the not-so intuitively obvious rule for CERCLA compliance with RCRA. USEPA in Washington has not made a decision whether the same logic (which has been used generally for soil) is also appropriate for ground water. Therefore, this justification should be used for ground water until USEPA in Washington makes a determination that it should not be.

Decontamination water in which other solvents are used cannot be put on the ground. Please make other arrangements for its disposal.

6. QAPP Question Follow-up.

a. Bottle blanks.

Overall, if high field or lab blank contamination causes problems with the results, resampling may be necessary. You need to be able to identify the likely source of the problem (you'll probably want to pass on the resample costs accordingly). I think there are ways to isolate the problem without routine testing of bottle lots. I am open to your suggestion.

b. Computer library searches.

the current USEPA contract lab program contract states "... the 1989 or most recent release of the NIST/EPA/MSDC mass spectral library (containing 50,000 spectra) must be used." Since only about the top 20 tentatively identified compounds are generally reported, there is potentially a significant difference in the compounds to be identified from a library of 50,000 spectra vs. a library of 35,000 spectra. USEPA cannot approve of an approach that is less stringent than what we ourselves are required to do.